

**Specialties Complex
ExxonMobil Baton Rouge Refinery
Baton Rouge, East Baton Rouge Parish, Louisiana
Agency Interest Number: 2638**

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Specialties Complex
ExxonMobil Baton Rouge Refinery (BRRF)
Baton Rouge, East Baton Rouge Parish, Louisiana
Agency Interest Number: 2638
Activity Number: PER20090009
Proposed Permit Number: 2341-V2**

I. APPLICANT

Company:

ExxonMobil Baton Rouge Refinery
PO Box 551
Baton Rouge, Louisiana 70821-0551

2341-V2

Facility:

ExxonMobil Baton Rouge Refinery - Spe
4045 Scenic Highway
Baton Rouge, East Baton Rouge Parish, Louisiana
Approximate NAD83 coordinates: 30°29'04"22 hundredth latitude, and 91°10'51"17 hundredth longitude.

II. FACILITY AND CURRENT PERMIT STATUS

ExxonMobil Refinery and Supply Company owns and operates the Baton Rouge Refinery, a petroleum refinery located in Baton Rouge, Louisiana.

The Specialties Complex consists of the Lube Extraction (LELA), Ketone Dewaxing (KDLA), Wax Hydrofining (WHLA), Lube Hydrofining (LHLA) facilities and the West Complex (WCPLX). The LELA facility processes various feed stocks to produce a paraffinic raffinate product. The KDLA facility separates wax and oil from lube oil feed stocks. The WHLA facility improves the color and removes sulfur from wax. The LHLA facility improves the color, odor, sulfur content, or a combination of properties for certain products. The WCPLX has pumping, storage, loading and blending areas, including the Specialties Tank Farm. The Specialties Tank Farm includes fixed roof tanks used in storing materials associated with lube manufacturing.

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The Specialties Complex is an existing facility at BRRF, operating under Part 70 Permit 2341-V1 issued October 11, 2007.

Several Part 70 permits addressing portions of the facility have already been issued. These include:

Permit No.	Unit or Source	Date Issued
2755-V3	Pipestill Complex	10/08/2008
2385-V5	Catalytic Cracking Complex	01/08/2009
2589-V4	Light Ends	09/04/2008
2234-V4	Coker Complex	12/09/2008
2176-V4	Low Sulfur Mogas Complex	07/15/2009
2447-V2	Hydroprocessing	09/23/2008
2296-V3	Light Oils	07/30/2008
2261-V2	Reformer	08/18/2008
2341-V1	Specialties Complex	10/11/2007
2047-V1	Docks	04/11/2006
2363-V2	Utilities	11/05/2008
2795-V4	Refinery Tank Farm	8/7/2009
2926-V0	Complex Labs	08/31/2005
2300-V0	Sulfur Plant	03/20/2006
3060-V0	Hydrofining Unit	01/18/2008
0840-00127-V3	Marketing Terminal	01/11/2007

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on June 10, 2009 requesting a Part 70 operating permit renewal for the Specialties Complex. Additional information dated July 21, 2009 was also submitted.

Project

This permit is the Part 70 operating renewal/modification which incorporates the emission sources from the permit 2341-V1 and includes the reconciliation of emission factor changes. This permit also includes an alternate operating scenario for tanks 537 and 538 to allow these tanks to be capable of storing unit solvent slop during turnaround operations. Also, 8 storage tanks and the associated emissions have been removed from this permit, due to the tanks being dismantled. Additionally, the emissions from solvent emission sources have been reconciled to mitigate double-counting of emission sources (previously accounted for in fugitive and solvent emission sources).

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Proposed Permit

Permit 2341-V2 will be the Part 70 operating permit renewal/modification of Part 70 operating permit 2341-V1 for the Specialties Complex.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	35.64	35.64	-
SO ₂	432.65	97.64	-335.01
NO _x	268.06	268.06	-
CO	281.95	302.57	20.62
VOC	1126.33	1119.45	-6.88

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

ID No.:	Applicable Requirement	Compliance Method/Provision
UNF 01 Entire Facility	Control of Organic Compounds – Limiting VOC Emissions from Industrial Wastewater LAC 33:III.2153.A	DOES NOT APPLY – This regulation does not apply to Petroleum Refineries
	NSPS Subpart QQQ – Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems 40 CFR 60.690(a)	DOES NOT APPLY – The provisions of this subpart only apply to affected facilities for which construction, modification, or reconstruction is commenced after May 4, 1987
	NESHAP for Source Categories Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections 112(g) and 112(j) 40 CFR 63.40 and 63.43(a)	DOES NOT APPLY – The requirements of this subpart that implement Section 112(g) of the CAA, applies to the construction or reconstruction of new process or production units which emit or have the potential to emit ≥ 10 TPY of any HAP or ≥ 25 TPY of any combination of HAPs.
	Compliance Assurance Monitoring for Major Stationary Sources	DOES NOT APPLY – A pollutant-specific emissions unit that does not use a control device to

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		device emission required to be classified as a major source is not subject to the provisions of this rule.
	NESHAP for Source Categories Subpart EEEE – Organic Liquids Distribution (Non-Gasoline) 40 CFR 63.2330(a)	DOES NOT APPLY – There are no sources in this permit that are currently subject to the Organic Liquids Distribution (OLD) MACT.
	NESHAP for Source Categories Subpart GGGGG – Site Remediation NESHAP 40 CFR 63.7381(a)	APPLIES – The facility uses Remediation Material Management Units (RMMUs) to manage remediation material generated from site remediation associated with unplanned releases. A variety of containers are used as RMMUs.
KDLA/CT-22 LELA/CT34 E LELA/CT34 W Cooling Towers	NESHAP for Source Categories Subpart Q – Cooling Towers 40 CFR 63.400(a)	DOES NOT APPLY – Subpart only applies to industrial process cooling towers that are operated with chromium-based water treatment chemicals
KDLA/D402 Condensable Blowdown Drum	Control of Organic Compounds – Waste Gas Disposal LAC 33:III.2115.H.1.c	EXEMPT – Waste gas streams with a combined weight of VOC < 100 lb/24 hr period (45.4 kg/day) are exempt.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY – MACT is not required for sources which do not emit Class I or Class II toxic air pollutants at a rate ≥ the minimum emission rate.
	NESHAP for Source Categories Subpart CC – Petroleum Refineries, Miscellaneous Process Vents 40 CFR 640	EXEMPT FROM CONTROL – Miscellaneous process vents having an organic HAP concentration of less than 20 ppmv and/or VOC emissions less than 33 kg/day (Group 2) are subject to only recordkeeping requirements.
	Compliance Assurance Monitoring for Major Stationary Sources 40 CFR 64.2(a)	DOES NOT APPLY – A pollutant-specific emissions unit that does not use a control device to achieve compliance with an emission limitation or standard and/or does not have potential pre-control device emission required to be classified as a major source is not subject to the provisions of this rule.
KDLA/F425 LELAE/F1 LELAS/F3 KDLA/F451 Furnaces	Emission Standard for Sulfur Dioxide Emission Limitations LAC 33:III.1503.C	EXEMPT – Units emitting < 250 tpy SO ₂ are exempt.
	Emission Standard for Sulfur Dioxide, CEM Requirements LAC 33:III.1511.A	EXEMPT – CEM is not required for flares and sources emitting < 100 tpy of SO ₂ .
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5105.B.3.a	EXEMPT – Emissions from the combustion of Group 1 virgin fossil fuels are exempt from the requirements of Chapter 51 Subchapter A
	Control of Emissions of Nitrogen Oxides LAC 33:III.2201.A	APPLIES – The Facility-Wide Averaging Plan as an alternative means establishes a facility-wide emission factor for multiple affected facilities. Furnaces are included in this plan.
	NSPS Subpart J - Standards of Performance for Petroleum Refineries 40 CFR 60.100	APPLIES – Furnace in petroleum refineries as an affected source shall comply with all applicable requirements of this subpart.
KDLA/TK0334 KDLA/TK0537(Normal) KDLA/TK0538(Normal) LELA/TK0119 LELA/TK0129 LELA/TK0529 LELA/TK0532 LELA/TK0533 WCPLX/TK0027	Control of Organic Compounds – Storage of Volatile Organic Compounds LAC 33:III.2103	DOES NOT APPLY – The provisions of this section are not applicable to storage vessels storing VOC with a maximum TVP < 1.5 psia.
	Comprehensive Toxic Air Pollutant Emission Control Program	DOES NOT APPLY – MACT is not required for a source which does not emit Class I or Class II toxic

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WCPLX/TK0040 WCPLX/TK0049 WCPLX/TK0050 WCPLX/TK0150 WCPLX/TK0237 WCPLX/TK0302 WCPLX/TK0303 WCPLX/TK0304 WCPLX/TK0305 WCPLX/TK0306 WCPLX/TK0307 WCPLX/TK0308 WCPLX/TK0309 (Cont'd) WCPLX/TK0310 WCPLX/TK0311 WCPLX/TK0312 WCPLX/TK0313 WCPLX/TK0314 WCPLX/TK0321 WCPLX/TK0322 WCPLX/TK0323 WCPLX/TK0324 WCPLX/TK0325 WCPLX/TK0326 WCPLX/TK0327 WCPLX/TK0328 WCPLX/TK0329 WCPLX/TK0332 WCPLX/TK0339 WCPLX/TK0340 WCPLX/TK0341 WCPLX/TK0342 WCPLX/TK0345 WCPLX/TK0346 WCPLX/TK0348 WCPLX/TK0349 WCPLX/TK0354 WCPLX/TK0373 WCPLX/TK0376 WCPLX/TK0381 WCPLX/TK0382 WCPLX/TK0383 WCPLX/TK0434 WCPLX/TK0440 WCPLX/TK0441 WCPLX/TK0442 WCPLX/TK0449 WCPLX/TK0534 WCPLX/TK0560 WCPLX/TK0561 WCPLX/TK0567 WCPLX/TK0568 WCPLX/TK0569 WCPLX/TK0576 WCPLX/TK0583 WCPLX/TK0584 WCPLX/TK0586 WCPLX/TK0591 WCPLX/TK0592 WCPLX/TK0593 WCPLX/TK0594 WCPLX/TK0595 WCPLX/TK0596 WCPLX/TK0597 WCPLX/TK0598 WCPLX/TK0600 WCPLX/TK0620 WCPLX/TK0624 WCPLX/TK0632 WCPLX/TK0633 WCPLX/TK0634 WCPLX/TK0635 WCPLX/TK0803 WCPLX/TK0812 WCPLX/TK0800 WCPLX/TK0639 WCPLX/TK0640 WCPLX/TK0642 WCPLX/TK0643 WCPLX/TK0644 WCPLX/TK0646 WCPLX/TK0647 WCPLX/TK0651 WCPLX/TK0652 WCPLX/TK0718 WCPLX/TK0662 WCPLX/TK0663 WCPLX/TK0679 WCPLX/TK0685 WCPLX/TK0686 WCPLX/TK0687 WCPLX/TK0688 WCPLX/TK0689 WCPLX/TK0690 WCPLX/TK0691 WCPLX/TK0692 WCPLX/TK0693 WCPLX/TK0694 WCPLX/TK0699 WCPLX/TK0717 WCPLX/TK0707 WCPLX/TK0709 WCPLX/TK0711 WCPLX/TK0712 WCPLX/TK0713 WCPLX/TK0714 WCPLX/TK0715 WCPLX/TK0716 Storages	LAC 33:III.5109.A	air pollutants
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b	DOES NOT APPLY – The provisions of this subpart apply only to volatile organic liquid storage vessels for which construction, reconstruction, or modification commenced after July 23, 1984.
	NESHAP Subpart Y – Benzene Emissions from Benzene Storage Vessels 40 CFR 61.270(a)	DOES NOT APPLY – Source is not subject to the provisions of any standard of this part.
	NESHAP Subpart FF – Benzene Waste Operations, Storage Vessel Provisions 40 CFR 61.340	DOES NOT APPLY – The provisions of this subpart apply only to waste management units.
KDLA/TK0705(Normal) KDLA/TK0705(ALTSCI) KDAL/TK0838(Normal) KDAL/TK0838(ALTSCI) KDLA/TK0537(ALTSCI) KDLA/TK0538(ALTSCI) Storage Vessels	NESHAP Subpart CC –Petroleum Refineries, Storage Vessel Provisions 40 CFR 63.646	APPLIES – Group 2 storage vessels shall comply with the recordkeeping requirements of this subpart.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Ka – Standards of	DOES NOT APPLY – The provisions of this

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	Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b	DOES NOT APPLY – The provisions of this subpart apply only to volatile organic liquid storage vessels for which construction, reconstruction, or modification commenced after July 23, 1984.
	NESHAP Subpart Y – Benzene Emissions from Benzene Storage Vessels 40 CFR 61.270(a)	DOES NOT APPLY – Sources are not subject to the provisions of any standard of this part.
	NESHAP Subpart FF – Benzene Waste Operations, Storage Vessel Provisions 40 CFR 61.340	DOES NOT APPLY – The provisions of this subpart apply only to waste management units.
KDAL/TK0838(Normal) KDLA/TK0705(Normal)	NESHAP Subpart CC –Petroleum Refineries, Storage Vessel Provisions 40 CFR 63.646	APPLIES – Group 2 storage vessels shall comply with the recordkeeping requirements of this subpart.
KDAL/TK0838(ALTSC1) KDLA/TK0705(ALTSC1)	NESHAP Subpart CC –Petroleum Refineries, Storage Vessel Provisions 40 CFR 63.646	APPLIES – Group 1 storage vessels shall comply with all applicable requirements of this subpart.
LELA/TK0530 Storage Vessel	Control of Organic Compounds – Storage of Volatile Organic Compounds LAC 33:III.2103	DOES NOT APPLY – Storage vessels storing VOC with a maximum TVP < 1.5 psia are exempt from the provisions of this section except for LAC 33:III.2103.H.3 and I.4.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY – MACT is not required for sources which do not emit Class I or Class II toxic air pollutants.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	EXEMPT – Storage vessel exempt from the control and recording requirements of Subpart K, is required to comply only with 40 CFR 63 Subpart CC.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b	DOES NOT APPLY – The provisions of this subpart apply only to volatile organic liquid storage vessels for which construction, reconstruction, or modification commenced after July 23, 1984.
	NESHAP Subpart Y – Benzene Emissions from Benzene Storage Vessels 40 CFR 61.270(a)	DOES NOT APPLY – Source is not subject to the provisions of any standard of this part.
	NESHAP Subpart FF – Benzene Waste Operations, Storage Vessel Provisions 40 CFR 61.340	DOES NOT APPLY – The provisions of this subpart apply only to waste management units.
	NESHAP Subpart CC –Petroleum	APPLIES – Group 2 storage vessels shall comply

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	Refineries, Storage Vessel Provisions 40 CFR 63.646	with the recordkeeping requirements of this subpart.
LELA/TK0531 WCPLX/TK0806 Storage Vessel	Control of Organic Compounds – Storage of Volatile Organic Compounds LAC 33:III.2103	DOES NOT APPLY – Storage vessels storing VOC with a maximum TVP < 1.5 psia are exempt from the provisions of this section except for LAC 33:III.2103.H.3 and I.4.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY – MACT is not required for sources which do not emit Class I or Class II toxic air pollutants.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b(b) & (c)	DOES NOT APPLY – Storage vessels do not meet capacity and/or TVP (<0.5 psia) applicability criteria.
	NESHAP Subpart Y – Benzene Emissions from Benzene Storage Vessels 40 CFR 61.270(a)	DOES NOT APPLY – Source is not subject to the provisions of any standard of this part.
	NESHAP Subpart FF – Benzene Waste Operations, Storage Vessel Provisions 40 CFR 61.340	DOES NOT APPLY – The provisions of this subpart apply only to waste management units.
	NESHAP Subpart CC – Petroleum Refineries, Storage Vessel Provisions 40 CFR 63.646	APPLIES – Group 2 storage vessels shall comply with the recordkeeping requirements of this subpart.
LELAN/F1NX LELAN/F301 WHLA/F150 LELAS/F4 Furnaces	Emission Standard for Sulfur Dioxide Emission Limitations LAC 33:III.1503.C	EXEMPT – Units emitting < 250 tpy SO ₂ are exempt.
	Emission Standard for Sulfur Dioxide, CEM Requirements LAC 33:III.1511.D	EXEMPT – CEM is not required for flares and sources emitting < 100 tpy of SO ₂ .
	Control of Emissions of Nitrogen Oxides – Affected Facilities in the Baton Rouge Nonattainment Area and the Region of Influence LAC 33:III.2201.C.1	EXEMPT – Boilers and process heaters/furnaces with a maximum rated capacity of < 40 MM Btu/hr in Baton Rouge Nonattainment Area are exempt from the provisions of Chapter 22.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5105.B.3.a	EXEMPT – Emissions from the combustion of Group 1 virgin fossil fuels are exempt from the requirements of Chapter 51 Subchapter A
	NSPS Subpart J - Standards of Performance for Petroleum Refineries	APPLIES – Furnace in petroleum refineries as an affected source shall comply with all applicable

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	40 CFR 60.100	requirements of this subpart.
SPEC/FUG Complex Fugitives	NESHAP Subpart J – National Emission Standard for Equipment Leaks of Benzene 40 CFR 61.110(c)(3)	EXEMPT – Complex does not have streams that contain $\geq 10\%$ by weight benzene.
	NESHAP Subpart V – National Emission Standard for Equipment Leaks of VHAP 40 CFR 61.240(a)	DOES NOT APPLY – Complex does not have streams that contain $\geq 10\%$ by weight VHAP.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	APPLIES – Compliance with LA Refinery MACT.
SPEC/LOADING Complex Loading Operations	Control of Organic Compounds – Volatile Organic Compounds – Loading LAC 33:III.2107.A	DOES NOT APPLY – Loading facilities of VOCs having a TVP < 1.5 psia are not subject to the provisions of this section.
	NESHAP for Source Categories Subpart CC – Petroleum Refineries, Marine Tank Vessel Loading Operations 40 CFR 63.651	DOES NOT APPLY – Petroleum refining process units and related emission points that do not emit or have equipment containing or contacting one or more of the HAPs are not subject to the provisions of this subpart.
	NESHAP for Source Categories Subpart Y – Marine Tank Vessel Tank Loading Operations 40 CFR 63.560(a)	DOES NOT APPLY – MACT standards apply to loading operations with aggregate emissions ≥ 10 tons of any HAP or ≥ 25 tons of all HAPs. Source does not emit HAPs.
	NESHAP for Source Categories Subpart EEEE: Organic Liquids Distribution (Non-Gasoline) 40 CFR 63 Subpart EEEE	DOES NOT APPLY - The Organic Liquids Distribution (OLD) MACT applies to distribution operations of organic liquids defined as any non-gasoline liquid or liquid mixture that contains = or > 5% by of organic HAP. Specialties Complex products do not meet the definition of organic liquid in the rule.
SPEC/WW Specialties Complex Catch Basins and Sewer Vents	NSPS Subpart QQQ – Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems 40 CFR 60.690(a)	DOES NOT APPLY – The provisions of this subpart only apply to affected facilities for which construction, modification, or reconstruction commenced after May 4, 1987.
	NESHAP for Source Categories Subpart CC – Petroleum Refineries, Wastewater Provisions 40 CFR 63.647(a)	DOES NOT APPLY – Wastewater streams having a benzene concentration of less than 10 ppmw (Group 2) are not regulated by this subpart.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	APPLIES – Compliance with LA Refinery MACT.
WCPLX/TK0046 WCPLX/TK0047 WCPLX/TK0315 WCPLX/TK0443 WCPLX/TK0448 WCPLX/TK0562 WCPLX/TK0629 WCPLX/TK0931 WCPLX/TK0932 WCPLX/TK0933 WCPLX/TK0935 WCPLX/TK0936 WCPLX/TK0937 WCPLX/TK0938 WCPLX/TK0939 WCPLX/TK0940 WCPLX/TK0941 WCPLX/TK0942	Control of Organic Compounds – Storage of Volatile Organic Compounds LAC 33:III.2103	DOES NOT APPLY – Storage vessels storing VOC with a maximum TVP < 1.5 psia are exempt from the provisions of this section except for LAC 33:III.2103.H.3 and I.4.
	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY – MACT is not required for sources which do not emit Class I or Class II toxic air pollutants at a rate \geq the minimum emission rate.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978. Storage vessels with a capacity of less than 40,000

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WCPLX/TK0943 WCPLX/TK0944 WCPLX/TK5309 WCPLX/TK5310 WCPLX/TK5311 WCPLX/TK5312 WCPLX/TK5313 WCPLX/TK5314 Storage Vessels		gallons are not subject to this subpart.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	DOES NOT APPLY – The provisions of this subpart apply only to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Storage vessels with a capacity of less than 40,000 gallons are not subject to this subpart.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b(b) & (c)	EXEMPT – Storage vessels which do not meet capacity and/or TVP applicability criteria are exempt from the control requirements. Recordkeeping requirements apply.
	NESHAP Subpart Y – Benzene Emissions from Benzene Storage Vessels 40 CFR 61.270(a)	DOES NOT APPLY – Source is not subject to the provisions of any standard of this part.
	NESHAP Subpart FF – Benzene Waste Operations, Storage Vessel Provisions 40 CFR 61.340	DOES NOT APPLY – The provisions of this subpart apply only to waste management units.
	NESHAP Subpart CC – Petroleum Refineries, Storage Vessel Provisions 40 CFR 63.646	APPLIES – Group 2 storage vessels shall comply with the recordkeeping requirements of this subpart.

Prevention of Significant Deterioration/Nonattainment Review

The permit does not authorize any construction. Therefore, PSD and NNSR do not apply.

Streamlined Equipment Leak Monitoring Program

Fugitive emissions from the facility are subject to LAC 33:III.2122, 40 CFR Subpart GGG, 40 CFR 63 Subpart CC and the LA Refinery MACT. ExxonMobil complies with the most stringent regulations (LA Refinery) as outlined in the LA Fugitive Emission Consolidation Program.

Unit	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
SPEC/FUG	LA Refinery MACT	5% VOTAP	LA Refinery MACT in the manner* agreed to be ExxonMobil in its approved Air Toxic Compliance Plan approved April 18, 1996, per Source Notice and Agreement dated October 14, 1996.
	LAC 33:III.2122	10% VOC	
	40 CFR 63 Subpart CC - modified HON option	5% VOHAP	
	40 CFR 60 Subpart GGG	10% VOC	

*In lieu of the requirement to monitor connectors (that have been opened or had the seal broken) during the next scheduled monitoring period, connector tightness testing is currently performed prior to equipment startup. Tightness testing may consist of nitrogen pressure test, hydro testing or high pressure steam. Tightness is verified by instrumentation or observation.

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MACT Requirements

Emissions of both Louisiana Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAPs) are above the major source threshold of 10/25 tons/year. The facility is classified as major source of TAPs pursuant to LAC 33:III.Chapter 51. The storage vessels meet MACT requirements by complying with 40 CFR 63 Subpart CC.

Air Quality Analysis

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was not requested..

VI. PERIODIC MONITORING

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permits.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

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Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those,

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which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.